

Thank you for the opportunity to comment on the latest version of AB 885. I thank you for the hard work your staff has put forth to create this document. I also thank you for your efforts to create regulations that are less tedious. I would like to comment on two issues:

1. I find the new proposed Setbacks onerous and would like to see them removed. No one has shown any proof that the required setbacks in Appendix K of the California Plumbing Code are not working. We are finding the setbacks set down by the Plumbing Code are difficult to maintain, if the setbacks are increased to public water wells, vernal pools, and surface water intakes, these setbacks could very well kill building projects. If the SWQCB or Department of Public Health could show incontrovertible evidence that the existing setbacks are not working, then I would agree with these new Setbacks, but these numbers are arbitrary just as the original 100' setback to a waterwell was arbitrary. This was a number that was picked by conscientious Sanitarians as more than adequately providing for public health. There is absolutely no reason to increase these Setbacks. The old ones are difficult enough to maintain.
2. I would like to comment on the requirement for notifying CDPH or Drinking Water Owners when Septic systems are placed within 1,200 feet of an intake for surface water treatment. Once again this distance is incredibly long, and has no connection with reality. The EPA Guide for Wastewater Treatment Systems shows that a properly working septic system will remove Biochemical oxygen demand, suspended solids, fecal indicators, and surfactants within 2-5 feet of unsaturated aerobic soil. Why then is a 1,200 foot notification distance necessary?

I am sure San Luis Obispo County will be willing to support this newest version of AB885 if the above concerns are addressed.

Sincerely:

Barry Tolle REHS

San Luis Obispo County Department of Planning and Building

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